

From: [Ambuter, Hal](#)
To: [John Hebert/DC/USEPA/US@EPA](#)
Cc: [Jennifer Gaines/DC/USEPA/US@EPA](#)
Subject: RE: Questions from RB
Date: 03/25/2009 10:15 PM

John

Another question that has just arisen.

For a Tier I approval (outdoor use)...is the only "requirement" the technical justification document on weatherability? Is there other data/factors that you will also require for this level of approval?

~ hal

-----Original Message-----

From: Hebert.John@epamail.epa.gov [mailto:Hebert.John@epamail.epa.gov]
Sent: Tuesday, January 27, 2009 10:59 AM
To: Ambuter, Hal
Cc: Gaines.Jennifer@epamail.epa.gov
Subject: RE: Questions from RB

Hi Hal - sorry if I didn't get back to you when you originally sent your email. Here are my responses.

1. There is not a protocol for weatherability. In lieu of a study/data we will accept a description of how the bait station design keeps out precipitation, limits the bait getting wet, etc.
2. The scenario you describe in your original question #2 sounds fairly straightforward. If you were only claiming Tier IV for the bait station, we could very quickly turn that registration around. The PRIA code would be R300 (with a 90 day review time) if no data were submitted.
3. Regarding the new question: It sounds like you will be submitting actual data on the bait station. If so, the submission will be coded as an R310. If you are only claiming Tier IV for the station, R300 is appropriate - like scenario #2 above.

Let us know if you have other questions. I apologize for any delays.

John

"Ambuter, Hal"
<Hal.Ambuter@rec.kittbenckiser.com>

01/27/2009 10:16 AM

To
John Hebert/DC/USEPA/US@EPA,
Jennifer Gaines/DC/USEPA/US@EPA

cc

Subject

RE: Questions from RB

John

I am not sure if this e-mail ever was delivered to you or not...

One new question:

What is the PRIA timeline for new registrations for a Tier'd bait station that is fully compliant with the mitigation measures...using an existing registered bait block (e.g. the only new data would be the test results on the bait station).

Thx
~ hal

-----Original Message-----

From: Ambuter, Hal
Sent: Wednesday, January 07, 2009 9:47 PM
To: 'Hebert.John@epamail.epa.gov'
Subject: Questions from RB

John

Happy New Year! Trust that you had a great holiday celebration.

Some questions for you.

1. Has EPA released any test protocols for "weatherability" for the Tier 1 bait stations?

2. We received two new registrations back in November 3282-90 and 3282-91, which were bait stations with Gen 2 bait blocks. As you are probably aware, New York state is refusing to allow registration of any new registration which is not fully compliant with the new mitigation measures....So, we would like to take these same two bait stations and switch out the Gen 2 bait block for a Gen 1 bait. The bait blocks will be using existing block registrations from another registrant --- so we would be citing their data like we did for the -90 and -91...Question....since you have already approved these stations and the new block is an existing registration, do you think we could obtain a fairly quick registration for these new stations?

Thanks for your time and attention...

~ hal

NOTICE

P Please Consider the Environment before printing this Email

This email was sent from within the Reckitt Benckiser Group plc group of companies. This email (and any attachments or hyperlinks within it) may contain information that is confidential, legally privileged or otherwise protected from disclosure. If you are not the intended recipient of this email, you are not entitled to use, disclose, distribute, copy, print, disseminate or rely on this email in any way. If you have received this email in error, please notify the sender immediately by telephone or email and destroy it, and all copies of it. We have taken steps to ensure that this email (and any attachments) are free from computer viruses and the like. However, it is the recipient's responsibility to ensure that it is actually virus free. Any emails that you send to us may be monitored for the purposes of ascertaining whether the communication complies with the law and our policies.

NOTICE

P Please Consider the Environment before printing this Email

This email was sent from within the Reckitt Benckiser Group plc group of companies. This email (and any attachments or hyperlinks within it) may contain information that is confidential, legally privileged or otherwise protected from disclosure. If you are not the intended recipient of this email, you are not entitled to use, disclose, distribute, copy, print, disseminate or rely on this email in any way. If you have received this email in error, please notify the sender immediately by telephone or email and destroy it, and all copies of it. We have taken steps to ensure that this email (and any attachments) are free from computer viruses and the like. However, it is the recipient's responsibility to ensure that it is actually virus free. Any emails that you send to us may be monitored for the purposes of ascertaining whether the communication complies with the law and our policies.